



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 11, 2021

BY ECF

Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Hamid Akhavan et al.*, S3 20 Cr. 188 (JSR)

Dear Judge Rakoff:

The Government respectfully submits this letter to address the recent request from a reporter to gain access to: (1) the unredacted version of certain documents that were filed in a redacted form in the above-captioned case (Dkt. 224 and 170), and (2) exhibits that have been admitted at this trial. The Government addresses each request below.

As to the first request, the Government objects to sharing the letter filed at docket number 224 in an unredacted form with the reporter. The document contains references to proactive cooperation as well as references to 3500 material that is covered by the Court's order governing 3500 material. (Dkt. 118). As to the motion *in limine* filed at docket number 170, the Government has no objection to providing GX 1684 in the same form it has been admitted in at trial.

Finally, as to the reporter's request for access to the exhibits that have been admitted at this trial, the Government does not have any general objection to this request. The Government has already provided the press with access to approximately over one hundred exhibits that have been admitted at trial. However, for documents requiring more substantial redactions to protect any sensitive personal identification information ("PII") or other sensitive information, such as bank records, we would ask for a reasonable period of time to allow the parties to confer about those documents and make redactions to those documents before producing them to the press. The Government has begun the process of identifying and redacting exhibits that are likely to contain such PII. As to the defense exhibits, the Government would request that the defense is responsible

for making any necessary redactions.

Very truly yours,

AUDREY STRAUSS
United States Attorney

by: s/_____
Nicholas Folly
Tara LaMorte
Emily Deininger
Assistant United States Attorneys
(212) 637-1060 / 1041 / 2472

cc: all counsel of record (by ECF)